

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

_____)	
IN RE: AUTOMOTIVE PARTS)	
ANTITRUST LITIGATION)	
_____)	
)	Master File No. 12-md-02311
IN RE: ALL AUTO PARTS)	Honorable Marianne O. Battani
CASES)	Special Master Gene J. Esshaki
_____)	
THIS DOCUMENT RELATES)	2:12-MD-02311-MOB-MKM
TO ALL ACTIONS)	
_____)	

**NON-PARTY KIA MOTORS MANUFACTURING GEORGIA, INC.’S
NOTICE OF FILING UNDER SEAL ITS SEPARATELY FILED
OBJECTIONS TO SPECIAL MASTER’S ORDER REGARDING THE
PARTIES’ MOTION TO COMPEL DISCOVERY FROM NON-PARTY
OEMS AND ORDER NON-PARTY OEM RULE 30(b)(6) DEPOSITIONS**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION)	Master File No. 12-md-02311
)	Honorable Marianne O. Battani
)	Special Master Gene J. Esshaki
In Re: All Auto Parts Cases)	
)	2:12-MD-02311-MOB-MKM
THIS DOCUMENT RELATES TO: ALL ACTIONS)	
)	

**NON-PARTY KIA MOTORS MANUFACTURING GEORGIA, INC.'S
NOTICE OF FILING UNDER SEAL ITS SEPARATELY FILED
OBJECTIONS TO SPECIAL MASTER'S ORDER
REGARDING THE PARTIES' MOTION TO COMPEL
DISCOVERY FROM NON-PARTY OEMS AND ORDERING
NON-PARTY OEM RULE 30(b)(6) DEPOSITIONS**

Non-Party Kia Motors Manufacturing Georgia, Inc. (KMMG), pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (the Protective Order) [Dkt. No. 200], hereby provides notice of filing under seal its Separately Filed Objections to Special Master's Order Regarding the Parties' Motion to Compel Discovery from Non-Party OEMs and Ordering Non-Party OEM Rule 30(b)(6) Depositions (the Objection), including the following three exhibits attached thereto:

- Exhibit A: Proposed Order submitted by the Parties to the Special Master;
- Exhibit B: Email to Special Master submitting Declaration of Robert Marzan; and
- Exhibit C: Proposed Order submitted by the SSEs to the Special Master.

Paragraph 19 of the Protective Order provides that “this Order shall serve as a stipulated order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal, in accordance with the procedures contained in the Protective Order. No means other than sealing will preserve the confidentiality of the confidential information contained in the Objection and its accompanying exhibits.

This the 4th day of May, 2016.

/s/ Meredith Jones Kingsley
Meredith Jones Kingsley
Ga. Bar No. 793726
Peter Kontio
Ga. Bar No. 428050
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, GA 30309-3424
Tel: 404-881-7000
Fax: 404-881-7777
E-mail: meredith.kingsley@alston.com
peter@kontio@alston.com

/s/ Ernest L. Greer
Ernest L. Greer, Esq.
Ga. Bar No. 309180
GREENBERG TRAURIG, LLP
Terminus 200 Building
3333 Piedmont Road NE, 25th Floor
Atlanta, Georgia 30305
Tel: 678.553.2100
Fax: 678.553.2212
E-mail: greere@gtlaw.com

Attorneys for Kia Motors Manufacturing Georgia, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2016, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Ernest L. Greer

Ernest L. Greer

MIA 185263816v1